

FILED
10/24/2024 **MEN**
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MARQUELL DAVIS,
RAMONE BRADLEY, and
EDMUND SINGLETON

Violations: Title 18, United States Code,
Sections 371, 924(c)(1)(A), and 2119

1:24-cr-00503
Judge Matthew F. Kennelly
Magistrate Judge Maria Valdez
RANDOM / CAT.4

COUNT ONE

The SPECIAL JUNE 2024 GRAND JURY charges:

1. On or about November 3, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

MARQUELL DAVIS,
RAMONE BRADLEY, and
EDMUND SINGLETON,

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, with intent to cause serious bodily harm, to take a motor vehicle, which had been transported, shipped, and received in interstate commerce from the presence of another person by force and violence and by intimidation, in violation of Title 18, United States Code, Section 2119.

2. It was part of the conspiracy that defendants MARQUELL DAVIS, RAMONE BRADLEY, EDMUND SINGLETON, and Individual A agreed to take a vehicle that had been transported, shipped or received in interstate commerce by force and violence and by intimidation.

3. It was further part of the conspiracy that defendants MARQUELL DAVIS, RAMONE BRADLEY, EDMUND SINGLETON, and Individual A committed the carjacking of Victim A.

4. It was further part of the conspiracy that defendants MARQUELL DAVIS, RAMONE BRADLEY, and EDMUND SINGLETON committed the attempted carjacking of Victim B.

5. It was further part of the conspiracy that defendants MARQUELL DAVIS, RAMONE BRADLEY, EDMUND SINGLETON, and Individual A obtained, possessed, and brandished a firearm, including a loaded tan and black snakeskin patterned Lone Wolf R&D handgun bearing serial number AAA 494 with a TSD Combat Systems 9mm slide and 9mm Glock barrel, a loaded Glock Model 19 9mm semiautomatic pistol bearing serial number BLR277, and a loaded Glock 30 Gen 4 .45 caliber semiautomatic pistol bearing serial number BPCL054, in connection with the taking of a motor vehicle from Victim A and the attempted taking of a motor vehicle from Victim B.

OVERT ACTS

6. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendants committed one or more overt acts in the Northern District of Illinois, and elsewhere, which overt acts included but were not limited to the following:

- (a) On or before November 3, 2022, defendant MARQUELL DAVIS obtained a firearm;

- (b) On or before November 3, 2022, defendant RAMONE BRADLEY obtained a firearm;
- (c) On or before November 3, 2022, defendant EDMUND SINGLETON obtained a firearm;
- (d) On or about November 3, 2022, in Chicago, defendant EDMUND SINGLETON drove MARQUELL DAVIS, RAMONE BRADLEY, and Individual A to a gas station located in the 10000 block of South Michigan Avenue with the intent to take a vehicle by force, violence, and intimidation;
- (e) On or about November 3, 2022, in Chicago, Individual A, carrying a firearm, approached Victim A's vehicle;
- (f) On or about November 3, 2022, in Chicago, defendant MARQUELL DAVIS, carrying a firearm, approached Victim A's vehicle;
- (g) On or about November 3, 2022, in Chicago, defendants MARQUELL DAVIS, RAMONE BRADLEY, and EDMUND SINGLETON carjacked Victim A;
- (h) On or about November 3, 2022, Individual A drove Victim A's car away from the gas station with MARQUELL DAVIS as passenger;
- (i) On or about November 3, 2022, in Chicago, defendant EDMUND SINGLETON drove RAMONE BRADLEY away from the gas station;
- (j) On or about November 3, 2022, in Chicago, defendant EDMUND SINGLETON drove MARQUELL DAVIS and RAMONE BRADLEY to a

second gas station, located in the 3100 block of South Michigan Avenue,
with the intent to take a vehicle by force, violence, and intimidation;

(k) On or about November 3, 2022, in Chicago, defendant RAMONE
BRADLEY, carrying a firearm, approached Victim B's vehicle;

(l) On or about November 3, 2022, in Chicago, defendant MARQUELL DAVIS,
carrying a firearm, approached Victim B's vehicle;

(m) On or about November 3, 2022, in Chicago, defendant MARQUELL DAVIS
took Victim B's car keys from Victim B;

(n) On or about November 3, 2022, in Chicago, defendants RAMONE
BRADLEY and MARQUELL DAVIS attempted to take Victim B's vehicle
by force, violence, and intimidation;

(o) On or about November 3, 2022, in Chicago, defendants RAMONE
BRADLEY and MARQUELL DAVIS got back into the car in which they had
arrived;

(p) On or about November 3, 2022, in Chicago, defendant EDMUND
SINGLETON drove RAMONE BRADLEY and MARQUELL DAVIS away
from the second gas station;

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about November 3, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division,

MARQUELL DAVIS and
EDMUND SINGLETON,

defendants herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely, a 2015 Infinity Q50, that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of Victim A by force, violence, and intimidation;

In violation of Title 18, United States Code, Section 2119.

COUNT THREE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about November 3, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division,

MARQUELL DAVIS and
EDMUND SINGLETON,

defendants herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which each may be prosecuted in a court of the United States,
namely, carjacking, in violation of Title 18, United States Code, Section 2119, as
charged in Count Two of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about November 3, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division,

MARQUELL DAVIS,
RAMONE BRADLEY, and
EDMUND SINGLETON,

defendants herein, with intent to cause death and serious bodily harm, attempted to take a motor vehicle, namely, a 2022 BMW X6, that had been transported, shipped, and received in interstate commerce from the person and presence of Victim B by force, violence, and intimidation;

In violation of Title 18, United States Code, Section 2119.

COUNT FIVE

The SPECIAL JUNE 2024 GRAND JURY further charges:

On or about November 3, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division,

EDMUND SINGLETON,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a loaded Glock Model 19 9mm semiautomatic pistol bearing serial number BLR277, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL JUNE 2024 GRAND JURY alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), 924(c), and 2119, as set forth in this Indictment, defendants shall forfeit to the United States of America any firearms and ammunition involved in and used in the offenses, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).
2. The property to be forfeited includes, but is not limited to, including a tan and black snakeskin patterned Lone Wolf R&D handgun bearing serial number AAA 494 with a TSD Combat Systems 9mm slide and 9mm Glock barrel and associated ammunition, a Glock Model 19 9mm semiautomatic pistol bearing serial number BLR277 and associated ammunition, and a Glock 30 Gen 4 .45 caliber semiautomatic pistol bearing serial number BPCL054 and associated ammunition.

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY